



# MASON CLASSICAL ACADEMY

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3073 HORSESHOE DRIVE S, NAPLES, FL 34104 · 239-227-2838 · MASONACADEMY.COM

Dear Board Member,

March 27, 2020

This is a written notice according to Policy 13.0 titled Violation of Established Policies.

At the March 23, 2020 board meeting the board approved switching the school's health insurance over to Captivated Health. During the March 26, 2020 meeting a community member brought to the attention of the board that as of March 25, 2020 David Bolduc will be managing Captivated Health's Tampa-based team.

The timeframe of the events has led to questions concerning a possible conflict of interest.

Per Policy 6.0 Conflict of Interest Policy – Duty to Disclose, it states:

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

After an actual or possible conflict is disclosed, the board is supposed to discuss and vote on if there is a conflict or not.

There was no disclosure of the possible conflict before the board voted and no discussion by the board on if it was a conflict. Due to this, the board should follow Policy 6.0 Conflict of Interest Policy – Violations of the Conflicts of Interest Policy. It says:

1. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
2. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Policy 13.0 also states that a copy of this notice will be submitted to the Board of Directors, reviewed at the next Board of Directors meeting and it will be included in the meeting minutes.

If there are any questions regarding this notice and policies, please contact me.

Regards,

Scott Moore

MCA Compliance Officer